

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

WILLIAM D. REINHARDT, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

ENERGY TRANSFER LP, KELCY L.  
WARREN, JOHN W. MCREYNOLDS, and  
THOMAS E. LONG,

Defendants.

Case No. 3:19-cv-2771

**AGREED STIPULATION AND MOTION FOR ENTRY  
OF AGREED ORDER REGARDING ANSWER DEADLINE**

WHEREAS, on November 20, 2019, Plaintiff filed a Class Action Complaint alleging violations of the federal securities laws (the “Complaint”) in Case 3:19-cv-2771;

WHEREAS, the first notice of the action was published on November 20, 2019 pursuant to the Private Securities Litigation Reform Act (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(A)(i), and the deadline for filing motions seeking appointment as lead plaintiff under the PSLRA is January 20, 2020;

WHEREAS, the PSLRA provides that “[n]ot later than 90 days after the date on which a notice is published under subparagraph (A)(i), the court shall consider any motion made by a purported class member in response to the notice . . . and shall appoint as lead plaintiff the member or members of the purported class that the court determines to be most capable of adequately representing the interests of class members.” *Id.* at § 78u-4(a)(3)(B)(i). The required notice was published on November 20, 2019.

WHEREAS, the undersigned counsel have conferred and agreed that Defendants shall have no obligation to answer or otherwise respond to the Complaint until a time that is agreed to by Defendants and lead plaintiff, and approved by the Court, after a lead plaintiff and lead counsel are appointed pursuant to the Private Securities Litigation Reform Act.

NOW, THEREFORE, by and through their undersigned counsel, Plaintiff and Defendants hereby stipulate, agree, and move for the Court to enter an Agreed Order as follows:

1. Defendants shall have no obligation to answer or otherwise respond until a time that is agreed to by Defendants and lead plaintiff, and approved by the Court, after a lead plaintiff and lead counsel are appointed pursuant to the PSLRA.
2. The terms of this Agreed Stipulation shall not have the effect of making any person or entity a party to any action in which he, she or it has not been named, served or added as such in accordance with the Federal Rules of Civil Procedure.
3. Counsel for Plaintiff and Defendants agree that this Agreed Stipulation is made in full reservation of and without waiver or prejudice of any rights, claims, objections (with the exception of objecting to improper service of process), defenses, arguments, and motions in relation to the Complaint (or any subsequently filed complaint), whether procedural, substantive or otherwise, that any party may otherwise have.

\* \* \*

Plaintiff and Defendant respectfully request that the Court enter the [Proposed] Agreed Order attached hereto.

AGREED as to form and content on this 20th day of December, 2019.

/s/ Willie C. Briscoe

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Energy Transfer LP, Kelcy L. Warren,  
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#### CERTIFICATE OF SERVICE

I certify that on the 20th day of December 2019, a true and correct copy of the foregoing document was filed with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

/s/ Jeffrey S. Johnston  
Jeffrey S. Johnston